

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA;)
the States of CALIFORNIA, COLORADO,)
CONNECTICUT, DELAWARE,)
FLORIDA, GEORGIA, HAWAII,)
ILLINOIS, INDIANA, IOWA,)
LOUISIANA, MARYLAND,)
MICHIGAN, MINNESOTA, MONTANA,)
NEVADA, NEW HAMPSHIRE,)
NEW JERSEY, NEW MEXICO,)
NEW YORK, NORTH CAROLINA,)
OKLAHOMA, RHODE ISLAND,)
TENNESSEE, TEXAS, and)
WASHINGTON; the Commonwealths of)
MASSACHUSETTS and VIRGINIA; and)
the DISTRICT OF COLUMBIA;)
ex rel. VALISURE LLC,)
Plaintiffs and Relator,)
v.)
GLAXOSMITHKLINE PLC, and)
GLAXOSMITHKLINE LLC,)
Defendants.)

Case No. 19-4239
Electronically Filed

CONSENT TO DISMISSAL WITH PREJUDICE

Pursuant to 31 U.S.C. § 3730(b)(1) and the Court’s March 13, 2024 Order (Doc. No. 47), and in consideration of Defendant GlaxoSmithKline, LLC’s (“GSK”) payment of the Settlement Amount required by the Stipulation and Order of Settlement between Relator Valisure LLC and Defendant GSK filed on April 3, 2025 (Doc. No. 83), the United States hereby informs the Court of its consent to (a) the dismissal of this action with prejudice as to the United States, as to federal claims for prescriptions of branded Zantac and generic ranitidine that were paid for by Medicare, Medicaid, Tricare, and the Veteran’s Administration between September 1, 2009 and September 30, 2019; and (b) the dismissal of this action without prejudice as to the United States, for all other claims for the Covered Conduct on behalf of the United States (c) to the entry by the Court of the

Order for Dismissal with Prejudice in the form attached as Exhibit B to the Stipulation and Order of Settlement.

The States of California, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Iowa, Louisiana, Massachusetts, Michigan, Minnesota, Montana, Nevada, New Hampshire, New Jersey, New York, North Carolina, Oklahoma, Rhode Island, Tennessee, Texas, Virginia, and Washington (the “States”), pursuant to state analogs of 31 U.S.C. § 3730(b)(1) or otherwise, and in consideration of GSK’s payment of the Settlement Amount required by the Stipulation and Order of Settlement between Relator Valisure LLC and Defendant GSK filed on April 3, 2025 (Doc. No. 83), also hereby inform the Court of their consent to (a) the dismissal of this action with prejudice, including as to the States, and including all claims for the Covered Conduct on behalf of the States; and (b) the entry by the Court of the Order for Dismissal with Prejudice in the form attached as Exhibit B to the Stipulation and Order of Settlement.

The States of Hawaii and New Mexico, and the District of Columbia, pursuant to state analogs of 31 U.S.C. § 3730(b)(1) or otherwise, also hereby inform the Court of their consent to (a) the dismissal of this action without prejudice, including all claims for the Covered Conduct; and (b) the entry by the Court of the Order for Dismissal without Prejudice in the form attached as Exhibit B to the Stipulation and Order of Settlement.

Dated: May 7, 2025

Respectfully submitted,

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